

## REMARKS

The Final Office Action has apparently overlooked new claims 15-17 and the new limitations therein, instead only mentioning claims 11-14 in addressing the new claims 11-17 that were added in the previous Office Action Response. The Final Office Action has also ignored the limitations in new claims 11-14 by asserting vaguely that these claims “contain similar subject matter as previously presented claims” instead of addressing the new and different limitations as required. Regarding claims 1-10, the Final Office Action did not address Applicant’s traversals (in contrast to M.P.E.P. 707.07(f)), and appears to rely upon a misinterpretation of the claims and of the cited reference, failing to show correspondence to the claimed power distribution network and (*i.e.*, dynamic) maintenance of constant circuit distance for different circuit elements by selectively switching circuit connections. The following addresses these and other issues in greater detail.

The Final Office Action dated May 14, 2008 indicated an objection to claim 1 as well as a Section 102(b) rejection of claims 1-17 over Kuroda (U.S. Patent Pub. 2001/0039643). Applicant traverses the objection and rejections.

The Section 102(b) rejections are improper because the cited (fixed) circuits of the ‘643 (Kuroda) reference do not maintain a distance that is constant for each of a plurality of different circuit elements. In addition, the cited transistors of the ‘643 reference do not provide static circuit flow between power/ground pads for various circuit elements because the transistors are the only circuit component between VDD and VSS. The connections to VDD and VSS in the ‘643 reference, relevant to each transistor, consist of a single conductor and thus do not disclose a network of conductors as claimed, or corresponding limitations directed to decoupling cells for selectively coupling portions of such a network to a circuit element. Cited figures 3, 4 and 6 in the ‘643 reference thus do not disclose the claimed decoupling cells and the claimed power distribution network, and do not maintain any combined distance between each of a plurality of circuit elements and respective power and ground pads as distance is changed or otherwise. For instance, referring to figures 4 and 6A, the circuits connecting the non-logic cells (transistors 30 and 31) to VDD and VSS are fixed and the indicated transistors do not supply power to other circuit elements. The ‘643 reference thus fails to anticipate corresponding limitations in independent claim 1 as well as

the claims that depend therefrom, and other relevant limitations in recently-added independent claim 14 and claims that depend therefrom.

Specifically regarding the limitations in claim 2, the asserted transistors and power connections in the '643 reference are fixed such that there is no change in the distance of any given circuit element and thus no corresponding increase or decrease in distance. For example, as shown in the equivalent circuit of FIG. 6(B) and as related to FIG. 4, each of the connections to VDD and VSS are fixed and do not present any power routing options for either of the transistors (30 and 31 in FIG. 6A). There appears to be no manner in which to maintain a consistent combined distance (*e.g.*, increase one distance and decrease a different distance) between respective pads and a circuit element. In this context, the '643 reference does not operate to change circuit connections to maintain a circuit length. Regarding claims 3-10 as well as recently-added claims 11-17, the '643 reference fails to provide correspondence to various limitations in view of the above and/or otherwise as asserted in the previously-filed Office Action Response, which is incorporated fully herein.

Further regarding new independent claim 14 and as applicable to claims 15-17 that depend therefrom, the asserted "decoupling cells" in the '643 reference do not connect a plurality of circuit elements to power/ground pads via conductors to maintain a constant combined distance. As discussed above, the cited transistors 30 and 31 are the only circuit elements between VDD and VSS and thus cannot connect any other circuit element. Specifically regarding dependent claim 15, which was not addressed in the Final Office Action, the cited transistors in the '643 reference do not form a network for "selectively connecting the conductors to the circuit element to decrease the distance between the circuit element and one of the power pad and the ground pad." Furthermore, the '643 reference does not disclose such selective connectivity in a manner "that is complementary to an increased distance between the circuit element and the other one of the power pad and the ground pad." The '643 reference also fails to disclose similar limitations in claim 16, which similarly involve a change in circuit distance that is complementary to a decreased distance. Regarding claim 17 and as is consistent with the above, the asserted transistors in the '643 reference do not selectively connect any circuit elements via conductors as the transistors are the only circuit elements between VDD and VSS.

In short, the asserted correspondence is based upon what appears to be a confused interpretation of the claim limitations and the operation of the cited reference; based upon this confusion, the citations to the '643 reference do not provide correspondence to the claimed invention. The Final Office Action attempts to show correspondence to the claim limitations by citing fixed, constant circuit distances, which do not comprehend limitations that are amenable to using a power network having decoupling cells for dynamically changing circuit distances in order to maintain a constant circuit length. In this context, the rejections confuse certain fixed or symmetrical circuits in the '643 reference with limitations directed to maintaining a distance between power/ground pads that is constant among all circuit elements, and to limitations directed to the dynamic changing of such a distance using decoupling cells. For example, the Final Office Action cites to a "[s]ymmetrical layout," "[s]ame/identical lengths," a "[c]omplementary layout" or a "[d]iagonally opposite corners layout" at page 3. However, none of these characteristics or related portions in the '643 reference disclose a power/ground pad distance that is maintained constant by decoupling cells for a plurality of circuit elements in a particular circuit.

In view of the above, Applicant submits that the Section 102(b) rejections are improper and should be removed. Regarding new claims 11-17, the Final Office Action has presented no correspondence to various limitations; absent any such showing of correspondence, Applicant understands that these claims should be in condition for allowance. Applicant therefore requests that the Section 102(b) rejections be removed.


Applicant traverses the objection to claim 1 because the word "the" (as subject of the rejection) is appropriate in referring to a property (combined distance) of the circuit and thus not raising antecedent basis issues. In an effort to facilitate prosecution, Applicant has amended claim 1 to change the word "the" to "a," and believes that this amendment does not change the scope, understanding or original intent of the claim. This amendment has not been made for reasons of patentability, over any cited art or otherwise.

In consideration of the above, Applicant believes that each of the rejections and objections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063.

*Please direct all correspondence to:*

Corporate Patent Counsel  
NXP Intellectual Property & Standards  
1109 McKay Drive; Mail Stop SJ41  
San Jose, CA 95131

CUSTOMER NO. 65913

By:   
Name: Robert J. Crawford  
Reg. No.: 32,122  
Eric J. Curtin  
Reg. No. 47,511  
(NXPS.459PA)